

UNITED STATES DISTRICT COURT ~~FILED~~  
DISTRICT OF MASSACHUSETTS ~~CLERK'S OFFICE~~  
CENTRAL DIVISION

P&M SERVICES, INC., a Tennessee  
corporation,

Plaintiff,

v

ANDRE LAVALLEE,

Defendant.

2005/04/07 A 11:54

Case No. 04-40173-FDS  
(Docket No. 5270-01)

**MOTION OF P&M SERVICES, INC. TO ADMIT MARK S. DEMOREST PRO HAC VICE**

I, J. Kevin Grogan, hereby move for the admission of Mark S. Demorest to appear pro hac vice pursuant to Local Rule 83.5.3 on behalf of Plaintiff P&M Services, Inc. ("P&M") and as grounds for this motion, state as follows:

1. I am a member of the bars of the Commonwealth of Massachusetts and the State of Connecticut, the United States District Court for the District of Massachusetts, and the United States District Court for the District of Connecticut, and I am appearing in this matter on behalf of P&M.

2. Attorney Mark S. Demorest ("Attorney Demorest") is a member of the Law Offices of Mark S. Demorest, PLLC, 19853 Outer Drive, Suite 100, Dearborn, Michigan 48124. Attorney Demorest and his firm previously represented P&M in other litigation between P&M and Lavalee's employer in Michigan, Wisconsin and California and is fully familiar with all of the factual and legal issues involved in this case.

3. Attorney Demorest is a member in good standing of the bar of the State of Michigan, the United States District Courts for the Eastern and Western Districts of Michigan, the Eastern District of Wisconsin and the Central District of Illinois, the United States Courts of Appeals for the Fourth, Sixth and Seventh Circuits, and the United States Supreme Court. Attorney Demorest has not been denied admission to or been disciplined by this Court or any other Court and is a member in good standing in every Court to which he has been admitted.

**FILING FEE PAID:**

**RECEIPT #** 204548

**AMOUNT \$** 30.00

**BY DPTY CLK** JAG

**DATE** 4-7-05

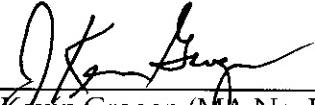
4. An Affidavit of Attorney Demorest attesting to the above facts is being filed with this motion.

5. Given the previous participation of Attorney Demorest in other litigation between P&M and Lavallee's employer, the interests of the parties and of justice will best be served by granting this motion to allow Attorney Demorest's participation, pro hac vice.

WHEREFORE, I request this Court to enter an Order admitting Attorney Demorest to appear in this matter on behalf of P&M and grant such relief as the Court deems just and appropriate.

P&M SERVICES, INC.

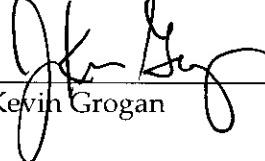
By its attorneys,

  
\_\_\_\_\_  
J. Kevin Grogan (MA No. BBO635089)  
Arthur F. Dionne (MA No. BBO125760)  
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Fax No. 413-733-4543

Dated: April 6, 2005

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(a)(2), I, J. Kevin Grogan, local counsel for Plaintiff P&M Services, Inc., hereby certifies that Natalie C. Najarian, also counsel to P&M Services, Inc., spoke with Seth Rodack, counsel for defendant, Andre Lavallee, on April 5, 2005, by telephone, and he consented to the allowance of this motion. Ms. Najarian also conferred with local counsel for Andre Lavalle, James P. Hoban, on April 5, 2005, by telephone, and he also consented to the allowance of this motion.



J. Kevin Grogan

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document and above-referenced Affidavit of Attorney Demorest were served upon the attorneys of record for the Defendant by mail on April 6, 2005.



J. Kevin Grogan